

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 760, 930, 973 & _____

**ORDER AUTHORIZING FILING UNDER SEAL OF CERTAIN
CONFIDENTIAL INFORMATION IN THE AMENDED FIRST NOTICE OF
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS
AND/OR UNEXPIRED LEASES**

Upon consideration of the motion (the “Motion”)² filed by the Debtors for entry of an order, pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(b), authorizing the Debtors to file portions of the Amended First Assumption Notice under seal; it appearing that there is good and sufficient cause for the relief set forth in this Order; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and the Court having found that venue of these cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that notice of the Motion has been given as set forth in the Motion and that

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms not otherwise defined herein shall have the meanings afforded to them in the Motion.

such notice is adequate and no other or further notice need be given; and that the legal and factual bases set forth in the Motion support the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED:

1. The Motion is GRANTED as provided herein.
2. The Debtors are authorized to file the Sealed Material contained in the Amended First Notice Assumption Notice under seal.
3. To the extent not already filed, the Debtors are directed to file an unredacted version of the Amended First Assumption Notice under seal; *provided, however*, that the Debtors shall provide an unredacted copy of the Amended First Assumption Notice to: (a) the U.S. Trustee, (b) the Court, (c) counsel to the Agent, (d) counsel to Burlington, and (e) any party-in-interest that obtains, after notice and a hearing, authorization from this Court.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.
6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this order.